REMARKS

Claims 1-6, 9-13, 16-48, 51 and 52 are pending. Claims 1, 41, and 51 are amended. New claims 53-57 have been added. Therefore, claims 1-6, 9-13, 16-48, 51-57 are presented for examination.

Claims 1-6, 9-13, 16-48 and 51-52 were rejected as being anticipated by U.S. Patent 5,319,751 to Garney.

The Examiner believes the claim language of claim 1 "at least one other device capable of hosting" does not require the existence of multiple host devices. Applicants have amended the claim language to further clarify that there are a plurality of potential host devices.

Claim 1, as amended, recites "detecting a connection of the first device to a particular host device selected from a plurality of other devices capable of hosting the first device; identifying the particular host device that is connected to the first device."

The Examiner does not concede that Garney does not teach the existence of multiple hosts. Applicants respectfully disagree. In the system of Garney, the feature card (first device) can only be connected only to a single host device, the computer system. Garney states "The computer system (single host) comprises an interface for receiving removable system resources (first device)." (Garney, column 3, lines 25-27). The language "Upon insertion of the card (first device) into the computer system (single host) ..." is also indicative of a single host device. (Garney, column 3, line 63). Additionally, Garney discusses a system in which removable resources (first device) are inserted into a slot on a computer system (single host). (Garney, column 3, line 23-34) The removable system resources can be expansion memory boards, parallel or serial input/output (I/O) ports, read only memory (ROM) or flash memory boards, computer network interface cards, modem cards, smart cards, or other removable system resources or special feature mechanisms (generally denoted feature cards or cards).

(Garney, column 3, line 23-34). While the first device in Garney can be any one of the above mentioned featured cards, the host device is the computer system. Nowhere does Garney teach or suggest a plurality of potential host devices. Therefore, the host device in Garney is defined as the definitive computer system and is not defined as one of multiple host devices.

The Examiner suggests that column 3, lines 63-68 of Garney teaches identification; when a connection is made between the feature card (first device) and the computer system (host) an identification is made. Applicants respectfully disagree. Garney does not teach identifying one or more types of host devices connected to the first device because Garney has only a single host device of one type, the computer system (host), that is connected to the feature card (first device). Therefore, it would not be logical in Garney to identify a host device type. Instead Garney teaches that the feature card and host system are coupled to each other and there is no suggestion in Garney that the feature card identifies the type of host device.

In Garney's system, such identification is unnecessary, since the computer system is predetermined as the only host. In contrast, claim 1 includes "identifying at least one particular host device that is connected to the first device." Since in the present invention, a host device can be one or more devices and can be one or more of multiple types of devices, such as a cellular phone, PDA, or other handheld device, Applicants' method includes an identifying step. It would not be logical to include such an identification in a system which only has a predetermined host system.

The Garney host device is predetermined and known as the computer system. Garney specifically states that "*The next five DDIB header fields (i.e. fields 411, 413, 415, 147, and 419) are all the same values contained within a standard operating system device driver header. Specifically, these five parameters are contained within the DOS (Disk Operating System developed by Microsoft, Corp., Redmond, Wash.)*

device driver header which is well known to those of ordinary skill in the art." (Garney, column 7, line 27-34). Thus, the system of Garney is definitionally a computer system which runs the DOS operating system. Garney does not teach identifying what type of host is connected to the first device, nor would it be logical to include such identification in Garney.

Furthermore, as Garney describes the process, there is no identification step. "As a card is inserted, a card insertion flag is set to indicate the removable system resource is coupled to the computer system." (Garney, column 4, lines 19-21). The feature card in Garney is not probing its environment to determine which type of host device it is connected to because the host device can only be the computer system. The first action of the feature card, when inserted, in Garney is alerting the computer system that it is present and coupled to the computer system (Garney, column 4, lines 19-21). It then immediately transfers the device driver stud code image to the host. It is clear that Garney does not teach or suggest "identifying a particular host device." Therefore, Garney does not anticipate claim 1, and claims 2-13, 16-40 and 53 that depend on claim 1.

Claim 41 as amended recites in part "a first device that may be connected to a plurality of second devices that are capable of hosting the first device; ... identifying the second device upon connection to the first device, said subsystem initiating communication between the two devices."

As noted above, Garney does not teach or suggest identifying the second device upon connecting the first device. Therefore, claims 41, and claims 42-50 and 54-56 which depend on it, are not anticipated by Garney.

Claim 51 as amended recites in part "a physical manager identify a host coupled to the client device, the host selected from among a plurality of potential hosts which may be coupled to the client device; ... an application/driver uploader to upload an

object of interest onto the host device, the object of interest determined based on the identity of the host device determined by the physical manager."

As discussed above, Garney does not teach or suggest any action based on the identity of the host device. Rather, Garney discusses that the first device is coupled to the host device and immediately transfers the device driver stud code image to the host. Therefore, no action based on a determined identity is made in Garney. Therefore, Garney does not anticipate claim 51, and claims 52 and 57 that depend on it.

Claims 7-8 and 49-50 were rejected as being unpatentable over Garney in view of U.S. Patent US005928325A to Shaughnessy et al. (hereinafter "Shaughnessy").

As noted above, Garney does not teach or suggest "detecting a connection of the first device to a particular host device selected from a plurality of other devices capable of hosting the first device; identifying the particular host device that is connected to the first device."

As discussed above, in Garney's system the host is always predetermined, thus no such identification step is taught or suggested.

Shaughnessy discusses message routing, and does not remedy the shortcomings of Garney discussed above with respect to claims 1, and 41. Claims 7-8 and 49-50 depend on claims 1 and 41 respectively. Therefore, claims 7-8 and 49-50 are not obvious over the combination of Garney in view of Shaughnessy.

Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

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